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June 24, 2025

Hon. Margaret M. Garnett  
United States District Judge  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007

Re: *Pospisil et al. v. ATP Tour, Inc. et al.*, No. 1:25-cv-02207-MMG (S.D.N.Y.)

Dear Judge Garnett:

We represent the Plaintiffs in the above-captioned action and write, further to discussions with non-parties Tennis Australia, Fédération Française de Tennis, The All England Lawn Tennis Club (Championships) Ltd., and the United States Tennis Association (together, the “Grand Slams”), to provide the Court with an update on Plaintiffs’ forthcoming amended complaint.

At the May 27, 2025 Initial Case Management Conference, Plaintiffs advised the Court that they intended to amend the complaint to name the four Grand Slams as defendants. Since then, Plaintiffs and the Grand Slams have agreed to engage in discussions on the matters raised in Plaintiffs’ complaint without the need for court intervention. In furtherance of those discussions, Plaintiffs have agreed, subject to Your Honor’s approval, to abstain from naming the Grand Slams as defendants for 90 days, at which point Plaintiffs shall provide the Court with an update on the status of such discussions, and further advise as to their intentions with respect to joinder of the Grand Slams. Because merits discovery is currently stayed while the Court first resolves the ATP’s § 1404 motion and the WTA’s motion to compel arbitration—which can be resolved in this 90 day period—a modest extension of time to join the Grand Slams will cause no undue delay, but may help facilitate a negotiated resolution to this matter.

Respectfully submitted,

/s/ Andrew S. Tulumello

Andrew S. Tulumello  
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(admitted *pro hac vice*)

cc: all counsel of record (via ECF)